Park

10A

State of New Jersey

Christine Todd Whitman
Governor

Department of Environmental Protection

Robert C. Shinn, Jr.
Commissioner

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
NO._____

Mr. Louis A. Fantin, Esq., Vice President
Lenox Incorporated
100 Lenox Drive
Lawrenceville, N.J. 08648-2394

JAN 19 1995

ENVIRONMENTAL PROTECTION
AGENCY REGION II
1995 JAN 25 AM 10:09
ARM-HAZ WASTE FAC. BRANCH

Dear Mr. Fantin:

Re: **RCRA Facility Investigation Report Addendum**
Galloway Township, Atlantic County

The New Jersey Department of Environmental Protection (Department) and the U.S. Environmental Protection Agency (EPA) have reviewed the above referenced report prepared by Eder Associates on behalf of Lenox Incorporated (Lenox) dated December 1994. The NJDEP and EPA have concluded that the Resource Conservation and Recovery Act Facility Investigation (RFI) Report is approved.

In accordance with Appendix F of the NJPDES-DGW Permit (NJ0070343), and Module III (p. III-20) of the HSWA Permit (NJD002325074), the Department and EPA are officially notifying Lenox that a corrective measures study (CMS) must be undertaken as a requirement of the Permits for Solid Waste Management Unit #2 (Sludge Disposal Area) and #13 (Area of Concern). Lead and Zinc are the only hazardous constituents which have exceeded the Department's direct contact soil cleanup criteria (SCC). The SCC for these two (2) elements are the following:

	Residential Criteria	Nonresidential Criteria
Lead	400 mg/kg	600 mg/kg
Zinc	1500 mg/kg	1500 mg/kg

This is also to inform you that the conceptual corrective measures presented by Lenox during the October 28, 1994 meeting are acceptable to the Department and EPA. The conceptual corrective measures outlined at the meeting are the following:

1. A small expansion of the existing asphalt cap and long term monitoring and maintenance of the existing asphalt cap and/or restriction of access (fencing) with a Declaration of Environmental Restrictions (DER) to the residential criterions for SWMU #2.

2. Restriction of Access (fencing) and/or asphalt cap with long term monitoring and maintenance of that fence with a DER to the residential criterions for unit #13, the Area of Concern.

651238

Within ninety (90) calendar days from receipt of this correspondence, Lenox should submit either a remedial action work plan that describes detailed technical aspects of the measures outlined above or a draft CMS workplan in accordance with Appendix F of the NJPDES-DGW permit and Module III of the HSWA Permit.

Upon Lenox's submission of an acceptable remedial action workplan, EPA will begin the process of modifying the HSWA permit, to formalize the selection of the remedial measures for the facility.

I would like to remind you that EPA requires that all remedial decisions be subject to an internal peer review. Therefore, upon receipt and review of the detailed remedial measures proposal, we will provide details of the plan to the Peer Review Group for their suggestions/concurrence. The HSWA permit will then be modified to incorporate the chosen remedial alternative.

Also be advised, the Pinelands Commission must receive copies of the CMS/remedial action work plan and final reports. The remediation will require the completion of an application with the Commission and any determinations regarding the final method or degree of remediation that is appropriate for the site must also be consistent with the requirements of the Pinelands Comprehensive Management Plan.

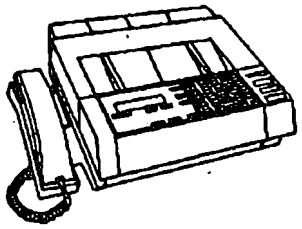
Should you have any questions, please contact me at (609) 633-1455.

Sincerely,

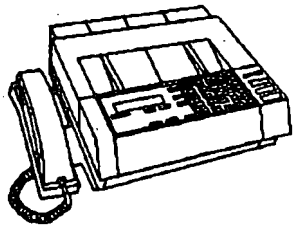
Frank Faranca

Frank Faranca, Project Manager
Bureau of Federal Case Management

c: Andrew Park, USEPA, Region II
Daryl Clark, NJDEPE/DPFSR/BGWPA
Todd DeJesus, Pinelands Commission
Sean Clancy, ACHD



EPA



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY, REGION II
26 FEDERAL PLAZA
NEW YORK, NY 10278
AIR AND WASTE MANAGEMENT DIVISION

COVER SHEET

TO: Frank F. Faranca **OFFICE/UNIT:** NJDEP-BFCM

TELEPHONE: 609-633-1455 **FAX NO:** 609-633-1454
CONFIRM NO.:

FROM: Andy Park **OFFICE/UNIT:** EPA-AWM-HWF

TELEPHONE: 212-264-8684 **FAX NO.:** (212) 264-6155
CONFIRM NO.: (212) 264-0505

DATE: 1/18/95 **NO. OF PAGES INCLUDING THIS COVER SHEET:** 2

REMARKS:

1/11/95

To: Frank Faranca, Project Manager
Bureau of Federal Case Management, NJDEP

Frank,

I have reviewed the revised draft II of a letter that you faxed to me on Jan. 11, 1995, concerning the approval of RFI for Lenox China. Although I agree, in concept, that the company may go directly into corrective measures implementation without going through a formal corrective measures study (CMS), I recommend the following changes to the draft letter:

- The third and forth paragraphs be replaced with the following:

  "This is also to inform you that the conceptual corrective measures presented by Lenox during the October 28, 1994 are acceptable to the Department and EPA. The conceptual corective measures outlined at the meeting are the following:

  1. Same.
  2. Same.

  Within ninety (90) calendar days from receipt of this correspondence, Lenox should submit either a remedial action work plan that describes detailed technical aspects of the measures outlined above or a draft CMS workplan in accordance with Appendix F of the NJPDES-DGW permit and Module III of the HSWA Permit.

  Upon Lenox's submission of an acceptable remedial action workplan, EPA will begin the process of modifying the HSWA permit, to formalize the selection of the remedial measures for the facility.

- I would like to remind you that EPA requires that all remedial decisions be subject to an internal peer review. Therefore, upon receipt and review of the detailed remedial measures proposal, we will provide details of the plan to the Peer Review Group for their suggestions/concurrence. The HSWA permit will then be modified to incorporate the chosen remedial alternative.

Andy Park

eder associates
environmental scientists and engineers

OFFICES:
Locust Valley, NY
Madison, WI
Ann Arbor, MI
Augusta, GA
Jacksonville, FL
Trenton, NJ
Tampa, FL

January 10, 1994
File # 530-07

Mr. Frank F. Faranca, Case Manager
New Jersey Department of Environmental Protection
Division of Responsible Party Site Remediation
Bureau of Federal Case Management
CN 028
401 East State Street
Trenton, New Jersey 08625-0028

Re: Revised RCRA Facility Investigation Addendum Report
Lenox China, Pomona, New Jersey

Dear Mr. Faranca:

I have enclosed two copies of the logs for borings B-24, B-25, and B-26 for your review. The boring logs were inadvertently omitted from Appendix A of the December 1994, RFI Addendum Report.

Please call me if you have any questions.

Very truly yours,

EDER ASSOCIATES

Mark Foley
Project Hydrogeologist

cc: A. Park
T. De Jesus
L. Fantin, Esq.
J. Kinkela
G. Berman
J. Barish

413 RIVERVIEW EXECUTIVE PARK, TRENTON, NEW JERSEY 08611 • (609) 695-1050 • FAX (609) 695-1003

BORING REPORT	EDER ASSOCIATES 480 Forest Avenue, Locust Valley, NY 11560 8000 Excelsior Drive, Madison, WI 53717 326 South State Street, Ann Arbor, MI 48104 4519 Pleasant Home Road, Augusta, GA 30907 9417 Baymeadows Road, Jacksonville, FL 32256 413 Riverview Executive Park, Trenton, NJ 08611	Sheet 1 of 1

DATE STARTED: 11/7/94	DATE FINISHED: 11/7/94	BORING NO.: B-24
CLIENT: LENOX CHINA		PROJECT NO.: 530-07
PROJECT NAME AND LOCATION: LENOX RFI - POMONA, NEW JERSEY		PREPARED BY: M. FOLEY
DRILLING CONTRACTOR: UNI-TECH	LOGGED BY: M. FOLEY	DRILLER:

EQUIPMENT	CASING	SOIL SAMPLER: SPLIT SPOON		CORE BARREL	AUGER	MONITORING WELL: RISER	SCREEN	DRILL RIG AND METHOD
TYPE:		STEEL						HOLLOW STEM AUGER
SIZE:		2'						
HAMMER WT/FALL	140 LB 36"			BIT				

SURFACE ELEVATION:	SURFACE CONDITIONS:

WATER LEVEL AT: FT. AFTER HRS. FT. AFTER HRS. FT. AFTER HRS.

DEPTH BELOW GRADE (ft.)	PID/FID READINGS (ppm)	SAMPLE TYPE AND NO.	SAMPLE DEPTH (FROM-TO)	MOISTURE CONTENT	RECOVERY	BLOWS/6" OR CORE TIME	STRATA DEPTH/ ELEV.	DESCRIPTION & REMARKS TRACE=0-10%, LITTLE=10-20% SOME=20-30%, AND=35-50%
1	0	B-24	0-6"	DRY	6"	6/10		SAND - p.g., m. to c., mostly c. lt. silt, lt. gravel, Black (SP)
2	0	B-24-1	6-24"	DRY	12"	11/6		SAND - p.g., m. to c., mostly c. tr. silt, tr. gravel, Brown (SP)
3	0	B-24-2	2-4'	DRY	18"	7/6		
4						7/9		SAND - p.g., m. to c., mostly c. sm. silt, tr. gravel, Brown (SP)
	0	B-24-3	4-6'	DRY	24"	11/13		SAND - p.g., m. to c., mostly c. sm. silt, tr. gravel, Brown (SP)
6						23/22		
7	0	B-24-4	6-8'	WET @ 8'	24"	6/13		SAND - p.g., m. to c., mostly c. sm. silt, tr. gravel, Brown (SP)
8						13/15		CLAY - non-plastic, stiff, tr. f. sand, White (CL)
9								End of boring @ 8'
11								
12								
13								
14								
16								
17								
18								
19								

BORING REPORT	EDER ASSOCIATES 480 Forest Avenue, Locust Valley, NY 11560 8000 Excelsior Drive, Madison, WI 53717 326 South State Street, Ann Arbor, MI 48104 4519 Pleasant Home Road, Augusta, GA 30907 9417 Bayneadows Road, Jacksonville, FL 32256 413 Riverview Executive Park, Trenton, NJ 08611	Sheet 1 of 1

DATE STARTED: 11/7/94	DATE FINISHED: 11/7/94	BORING NO.: B-25
CLIENT: LENOX CHINA		PROJECT NO.: 530-07
PROJECT NAME AND LOCATION: LENOX RFI - POMONA, NEW JERSEY		PREPARED BY: M. FOLEY
DRILLING CONTRACTOR: UNI-TECH	LOGGED BY: M. FOLEY	DRILLER:

EQUIPMENT	CASING	SOIL SAMPLER: SPLIT SPOON	SOIL SAMPLER:	CORE BARREL	AUGER	MONITORING WELL: RISER	MONITORING WELL: SCREEN	DRILL RIG AND METHOD
TYPE:		STEEL						HOLLOW STEM AUGER
SIZE:		2'						
HAMMER WT/FALL	140 LB 36"			BIT				

SURFACE ELEVATION:	SURFACE CONDITIONS:

WATER LEVEL AT: FT. AFTER HRS. FT. AFTER HRS. FT. AFTER HRS.

DEPTH BELOW GRADE (ft.)	PID/FID READINGS (ppm)	SAMPLE TYPE AND NO.	SAMPLE DEPTH (FROM-TO)	SAMPLE MOISTURE CONTENT	SAMPLE RECOVERY	BLOWS/6" OR CORE TIME	STRATA DEPTH/ ELEV.	DESCRIPTION & REMARKS TRACE=0-10%, LITTLE=10-20% SOME=20-30%, AND=35-50%
1	0	B-25	0-6"	DRY	6"	13/10		SAND - p.g., m. to c., mostly c. lt. silt, sm. gravel, Brown (SP)
2	0	B-25-1	6-24"	DRY	12"	5/4		SAND - p.g., m. to c., mostly c. sm. silt, sm. gravel, Brown (SP)
3	0	B-25-2	2-4'	DRY	24"	5/5		
4						5/7		SAND - p.g., m. to c., mostly c. sm. silt, tr. gravel, Brown (SP)
	0	B-25-3	4-6'	DRY	18"	8/9		SAND - p.g., m. to c., mostly c. sm. silt, tr. gravel, Brown (SP)
6						15/16		
7	0	B-25-4	6-8'	WET @ 8'	24"	7/23		SAND - p.g., m. to c., mostly c. sm. silt, tr. gravel, Brown (SP)
8						17/12		CLAY - non-plastic, stiff, tr. f. sand, White (CL)
9								End of boring @ 8'
11								
12								
13								
14								
16								
17								
18								
19								

BORING REPORT	EDER ASSOCIATES 480 Forest Avenue, Locust Valley, NY 11560 8000 Excelsior Drive, Madison, WI 53717 326 South State Street, Ann Arbor, MI 48104 4519 Pleasant Home Road, Augusta, GA 30907 9417 Baymeadows Road, Jacksonville, FL 32256 413 Riverview Executive Park, Trenton, NJ 08611	Sheet 1 of 1

DATE STARTED: 11/7/94	DATE FINISHED: 11/7/94	BORING NO.: B-26
CLIENT: LENOX CHINA		PROJECT NO.: 530-07
PROJECT NAME AND LOCATION: LENOX RFI - POMONA, NEW JERSEY		PREPARED BY: M. FOLEY
DRILLING CONTRACTOR: UNI-TECH	LOGGED BY: M. FOLEY	DRILLER:

EQUIPMENT	CASING	SOIL SAMPLER: SPLIT SPOON	SOIL SAMPLER:	CORE BARREL	AUGER	MONITORING WELL: RISER	MONITORING WELL: SCREEN	DRILL RIG AND METHOD
TYPE:		STEEL						HOLLOW STEM AUGER
SIZE:		2'						
HAMMER WT/FALL	140 LB 36"			BIT				

SURFACE ELEVATION:	SURFACE CONDITIONS:

WATER LEVEL AT: FT. AFTER HRS. FT. AFTER HRS. FT. AFTER HRS.

DEPTH BELOW GRADE (ft.)	PID/FID READINGS (ppm)	SAMPLE TYPE AND NO.	SAMPLE DEPTH (FROM-TO)	SAMPLE MOISTURE CONTENT	SAMPLE RECOVERY	BLOWS/6" OR CORE TIME	STRATA DEPTH/ ELEV.	DESCRIPTION & REMARKS TRACE=0-10%, LITTLE=10-20% SOME=20-30%, AND=35-50%
1	0	B-26	0-6"	DRY	6"	8/7		SAND - p.g., m. to c., mostly c. lt. silt, lt. gravel, Brown (SP)
2	0	B-26-1	6-24"	DRY	6"	5/4		SAND - p.g., m. to c., mostly c. lt. silt, lt. gravel, Brown (SP)
3	0	B-26-2	2-4'	DRY	24"	7/4		SAND - p.g., m. to c., mostly c. tr. silt, tr. gravel, Brown (SP)
4						4/6		
	0	B-26-3	4-6'	DRY	18"	6/6		SAND - p.g., m. to c., mostly c. lt. silt, tr. gravel, Brown (SP)
6						8/7		SAND - p.g., m. to c., mostly c. lt. silt, tr. gravel, White (SP)
7	0	B-26-4	6-8'	WET @ 8'	18"	8/8		CLAY - non-plastic, stiff, tr. f. sand, White (CL)
8						10/12		SAND - p.g., m. to c., mostly c. lt. silt, tr. gravel, Brown (SP)
9								End of boring @ 8'
11								
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10A

NJD 002325074

State of New Jersey

Department of Environmental Protection

Christine Todd Whitman
Governor

Robert C. Shinn, Jr.
Commissioner

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
NO._____

MAR 23 1995

Mr. Louis A. Fantin, Esq, Vice President
Lenox Incorporated
100 Lenox Drive
Lawrenceville, N.J. 08648-2394

Dear Mr. Fantin:

Re: **Lenox China Incorporated**
Spill Confirmation Reports 95-2-15-1659-14 and 95-2-16-1708-46
Galloway Township, Atlantic County

The New Jersey Department of Environmental Protection (NJDEP) has reviewed the spill confirmation reports noted above and submitted by Lenox on March 16, 1995. The Department has determined that the following additional requirements must be met before closure approval can be granted:

1. Pursuant to N.J.A.C. 7:26E-2.1 (Table 2-3 "Analytical Requirements for Petroleum Storage and Discharge Areas") TPHC analyses are required on all samples. In addition, VO+10 analysis is required on 25% of samples in which TPHC levels in soil exceeds 1000 PPM (minimum of one sample), and samples for VO analyses shall be those with the highest TPHC concentration (see enclosure).

2. For future spill events, please inform the spill dispatcher correctly that this site is managed by the Bureau of Federal Case Management and not the Bureau of Ground Water Pollution Abatement.

Should you have any questions, please contact me at (609) 633-1455.

Sincerely,

Frank Faranca

Frank Faranca, Project Manager
Bureau of Federal Case Management

enclosure
c: Andrew Park, USEPA, Region II
Daryl Clark, NJDEP/DPFSR/BGWPA
Todd DeJesus, Pinelands Commission
Sean Clancy, ACHD

RPCE\BFCM\LENOX\LENOX20.FFF

NOTE: ELIMINATION OF METALS FROM WASTE VEHICULAR CRANKCASE OIL BELOW IS PENDING REVIEW OF DATA RECEIVED FROM EPA AND EXXON.

TABLE 2-3

ANALYTICAL REQUIREMENTS FOR
PETROLEUM STORAGE AND DISCHARGE AREAS (11)

Sampling Objective	Soil Initial Screening/ Post-Remediation (1)	Water Initial Screening
Gasoline, Mineral Spirits	VO+10 (2), Lead (7)	VO+10 (2), MTBE (3) TBA (3), Lead (7)
Kerosene, Jet Fuel	VO+10 (2) Naphthalenes (5)	B/N+15 (10), VO+10 (2)
Fuel Oil No. 2, Diesel Fuel	TPHC (9)	B/N+15 (10), VO+10 (2)
Fuel Oil Nos. 4 & 6, Hydraulic Oils, Cutting Oil, Crude Oil, Lubricating Oil	TPHC, PAH (8)	B/N+15 (10), VO+10 (2)
Waste Oil	TPHC (6), VO+10 (2), B/N+15 (10), PCBs, Priority Pollutant Metals or EPA	PP+40 or TCL/TAL (4)

Target Analyte List

Waste Vehicular Crankcase Oil	TPHC (6), VO+10 (2) B/N+15 (10), PCBs	VO+10 (2), B/N+15 (10)
Waste Mineral Oil	TPHC	

1. Analytical parameters may be limited based on previous analytical results.
2. EPA target compound list volatile organic or priority pollutant volatile organic scans including xylene with a library search.
3. Methyl-tertiary-butyl-ether (MTBE), tertiary-butyl alcohol (TBA) analysis required if gasoline tanks were in service after 1979 and 1969 respectively.
4. Priority Pollutant plus forty (PP+40) including xylene or EPA Target Compound List plus 30 and EPA Target Analyte List, excluding PCB analysis.
5. Naphthalenes, including Naphthalene, Methyl Naphthalenes, Dimethyl Naphthalenes; may be analyzed in B/N+15 fraction or in VO fractions; if analyzed in VO fraction, instrument must be calibrated for these analytes. Quantitation of all isomers found shall be performed against at least one Methyl Naphthalene standard and at least one Di-Methyl Naphthalene Standard.
6. Total Petroleum Hydrocarbon (TPHC) analysis required on all samples. Other parameters required on 25 percent of sample where TPHC was detected (minimum of one sample); other parameters shall be analyzed for in the sample with the highest TPHC.
7. Lead Analysis required if source was or is leaded gasoline.
8. TPHC analysis required on all samples. Polynuclear aromatic hydrocarbons (per EPA Priority Pollutant List) analysis required on 25 percent of

samples where TPHC exceeds 100 ppm (minimum of one sample); samples for PAH analysis shall be those with the highest TPHC concentration.

9. TPHC analysis required on all samples; VO+10 analysis required on 25 percent of samples in which TPHC level in soil exceeds 1000 PPM (minimum of one sample); samples for VO analyses shall be those with the highest TPHC concentration.

10. EPA Target Compound List Base Neutral or Priority Pollutant Base Neutral scan with a library search.

11. Analyses are required on all samples unless otherwise noted.

7:26E-2.2 Quality assurance project plan

(a) If the Department requires a Quality Assurance Project Plan (QAPP) pursuant to an oversight document or the [ECRA] ISRA, UST, or any other regulatory program, the person responsible for conducting the remediation shall submit the Quality Assurance Project Plan in accordance with the schedule contained in the oversight document or applicable regulation, and in a format that corresponds directly to the outline of this section.

1 of A
NJD002325074

Christine Todd Whitman
Governor

State of New Jersey
Department of Environmental Protection

Robert C. Shinn, Jr.
Commissioner

JAN 23 1997

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
NO. Z288 500 828

Mr. Louis A. Fantin, VP
Lenox Incorporated
100 Lenox Drive
Lawrenceville, N.J. 08648

Dear Mr. Fantin:

Re: **Lenox China Facility**
Spill Report Correspondences, Case Number 96-12-6-1501-58
Galloway Township, Atlantic County

The New Jersey Department of Environmental Protection (Department) and the U.S. Environmental Protection Agency (EPA) received the above referenced spill report correspondence dated January 3, 1997 and subsequent laboratory report dated January 17, 1997 submitted by Lenox Incorporated (Lenox). During the period between December 2 through December 6, 1996 a contractor working on behalf of Lenox removed roof ballast (gravel), in preparation for installing a new built-up roof on the plant. Unbeknownst to Lenox, material removed from the roof contained glaze (leaded glass frit) which was mixed with the roof ballast. This glaze had built up over the years from a scrubber stack on the roof. The ballast mixed with glaze was removed from the roof and used to improve a gravel access driveway to plant outbuildings. It was not until the afternoon of December 6, 1996 that Lenox noticed the incident and it was immediately reported to the New Jersey Spill Hotline. This roof gravel was immediately removed and post-excavation soil samples confirm that Lenox has achieved the New Jersey Department of Environmental Protection's residential cleanup criteria of 400 mg/kg total lead. The actions taken by Lenox constitute the remediation of an area of concern to a residential standard (unrestricted use), and therefore the Department and EPA have determined that no further action is warranted at this area of concern.

Should you have any questions, please contact Frank Faranca of my staff at (609) 984-4071.

Sincerely,

Roman Luzecky, Section Chief
Bureau of Federal Case Management

c: Frank Faranca, NJDEP, DRPSR/BFCM
Andrew Park, USEPA, Region II
Daryl Clark, NJDEP/DPFSR/BGWPA
Todd DeJesus, Pinelands Commission

Rec'd 1/27/97
no enclosures
AP

LENOX
CHINA • CRYSTAL
POMONA NEW JERSEY 08240

January 17, 1997

BY CERTIFIED MAIL #P-543-413-112

Mr. Frank F. Faranca,
Case Manager
New Jersey Department of Environmental Protection
Division of Responsible Party Site Remediation
Bureau of Federal Case Management
CN 028
401 East State Street
Trenton, New Jersey 08625-0028

Re: Spill Report, Case Number 96-12-6-1501-58

Dear Mr. Faranca,

Lenox is submitting the attached laboratory report as an addendum to its spill report to confirm cleanup of the area surrounding sample F to below residential cleanup standards. Lenox removed additional gravel and scraped the area to bare soil. A composite sample was then taken by Mr. Simmons of Lenox and submitted to Townley Laboratories for total lead analysis. The results were non-detect at less than 1 milligram per kilogram on a dry weight basis (*mg/kg, dwb*). The removed material is being disposed as hazardous waste along with the remainder of the spill cleanup materials previously removed.

Per our recent discussion, this action concludes the cleanup action for this spill. Accordingly, , the contractors have been instructed to proceed immediately with replacing the material removed from the driveway with recycled concrete and gravel to restore it to original condition.

The retest data from the original sample F is also included for your records. The result was 1038 *mg/kg, dwb* as opposed to 810 *mg/kg, dwb* originally reported.

Should you have any questions concerning the above, please do not hesitate to contact me at (609) 965-8272.

Sincerely,

John F. Kinkela
Director of Environmental Engineering

JFK/jfk
w/Enclosures: Townley Laboratories, Inc. Analytical Reports

cc w/o enclosures:
K.R. Clark
J.H. Ennis
L.A. Fantin
G.W. Berman, CE Consultants

Mr. Andrew Park
United States Environmental Protection Agency
Air and Waste Management Division
Hazardous Waste Facilities Branch
Region II
26 Federal Plaza
New York, New York 10278

no enclosures
AP

LENOX
CHINA • CRYSTAL
POMONA NEW JERSEY 08240

January 3, 1997

BY CERTIFIED MAIL #P543413115

Mr. Frank F. Faranca,
Case Manager
New Jersey Department of Environmental Protection
Division of Responsible Party Site Remediation
Bureau of Federal Case Management
CN 028
401 East State Street
Trenton, New Jersey 08625-0028

Re: Spill Report, Case Number 96-12-6-1501-58

Dear Mr. Faranca,

Lenox is submitting the attached spill report to confirm its verbal report to the New Jersey Spill Hotline on December 6, 1996. The area of the spill has been remediated to well below the proposed residential cleanup level of 400 milligrams per kilogram based on the average of six soil samples taken in accordance with NJAC 7:26E-6.4.3. Please review this report and inform me of any other actions necessary to complete action on the spill.

The material involved in the spill was roof ballast (gravel) removed from the roof of the Lenox China Plant located in Pomona, New Jersey between December 2 and December 6, 1996 using a dust containment chute. The material was placed on a dirt driveway and a limited amount was spread onto the dirt driveway for covering. During his routine plant inspection rounds, the Environmental Compliance Manager observed that this ballast material included white streaks characteristic of glaze and reported it to the Environmental Operations Manager. A representative sample of the material was tested and it was determined that said material contained lead. This incident was immediately reported by telephone to the New Jersey Spill Hotline during the afternoon of December 6, 1966

A contractor was expeditiously located who was able to respond by six o'clock and provide a frontloader and operator to load the ballast piles into sealed gate containers covered with tarps. This was completed as of 10:00 PM. In order to achieve complete cleanup of the area where materials had been spread, additional sealed gate containers were ordered for delivery before 8:00 AM on Saturday. The contractor and Lenox supervisors started cleanup of the driveway at 7:30

AM. By keeping the machine on the contaminated area and scraping back from the contaminated perimeter, it was possible to avoid extending the contaminated area. Sufficient clean soil was removed with the ballast to assure a complete cleanup. Lenox was able to achieve a complete cleanup as clearly shown by the post-remediation soil samples.

Should you have any questions concerning the above, please do not hesitate to contact me at (609) 484-9798.

Sincerely,

John F. Kinkela
Director of Environmental Engineering

JFK/jfk
w/Enclosure NJ Spill Report

cc: K.R. Clark
J.H. Ennis
L.A. Fantin
G.W. Berman, CE Consultants

Mr. Andrew Park
United States Environmental Protection Agency
Air and Waste Management Division
Hazardous Waste Facilities Branch
Region II
26 Federal Plaza
New York, New York 10278

SPILL CONFIRMATION REPORT Case # 96-12-6-1501-58

1. Person who reported the discharge (by phoning the NJDEP or State Police)

John F. Kinkela, Environmental Engineer

Plant: Lenox China
Tilton Road
Pomona, NJ 08240

Office: Lenox Technical Center
2511 Fire Road, Suite B-12
Absecon, NJ 08201

2. Person submitting this confirmation report. John F. Kinkela

3. Person required to report the discharge. John F. Kinkela

4. Each person in any way responsible for the discharge:

(a.) Act or omission resulted in discharge:

Bill Todt
Lenox China
Tilton Road
Pomona, NJ 08240
(609) 484-9798

(b.) Allowed discharge to occur:

Not Applicable

(c.) Directly or indirectly caused discharge:

Project Manager: Bill Todt, Maintenance Scheduler

(d.) Person who owns or controls hazardous substance:

Lenox, Incorporated d/b/a Lenox China

(e.) Person who brokers, generates or transports the hazardous substance:

SJ Transportation

5. Owner and operator of the facility:

Lenox, Incorporated d/b/a Lenox China
100 Lenox Drive
Lawrenceville, NJ 08648
Telephone: (609)896-2800
Contact: L. A. Fantin, Sr. VP & General Council

6. Source of the discharge:

During removal of roof ballast (gravel), in preparation for installing a new built-up roof on the plant, material from an area which contained glaze (leaded glass frit) was inadvertently mixed in with the rest of the ballast. This ballast was from an area which had previously surrounded scrubber stacks in that area of the building. The ballast was then removed from the roof and used to improve a gravel access driveway to plant outbuildings.

7. Location of discharge:

a. Site: Lenox China

b. Street Address: Tilton Road

c. Tax Lot and Block: Block 453, Lot 1

d. Municipality: Township of Galloway

e. County: Atlantic

f. Department or EPA ID Numbers:
NJD002325074

g. Name of water body: Not Applicable

h. Latitude and Longitude of vessel: Not Applicable

8. Site Map: See Attached

9. Common Name and CAS Number of each hazardous substance: Lead 7439-92-1

10. Best estimate of quantity discharged: Less than 1..7 tonsof lead in 150 tons of gravel or 1%

11. Time and date discharge began: Discharge was discovered Friday afternoon December 6, 1996

12. Time and date discharge ceased Friday afternoon December 6, 1966

13. Time and date department notified: Friday afternoon December 6, 1966

14. Detailed description of measures taken to contain, clean-up and remove discharge: Ordered sealed gate roll-off containers and hired contractor to load material into containers. Used front loader to scrape below preexisting ground surface level, and loaded all material into sealed gate roll-offs.

15. Summary of all costs incurred: Approximately $ 1,000 for cleanup, $1,500 for laboratory analysis and $30,000 for disposal

16. Proof of proper disposal of all hazardous substances discharged: The TSD facility will provide a return copy of the hazardous waste manifests.

17. Corrective actions: Cleanup as noted above. Post-cleanup soil samples were taken and tested to confirm cleanup to below New Jersey cleanup standards

18. Additional preventive measures taken or proposed to minimize possibility of recurrence: No additional contaminated material, if any exists, will be placed on the ground.

19. Names of all entities involved in containment, clean-up or removal of discharge:
John F. Kinkela, Director of Environmental Engineering.
James H. Ennis, Environmental Operations Manager
Markland Construction Company
SJ Transportation
Chemical Waste Management

20. Description of samples: The remedial activities were verified by the collection and analysis of six soil samples (A through F as shown on the attached site plan). The samples were analyzed for moisture content and total lead on a dry weight basis.

21. Results of all sample analysis:

a. Person Conducting Analysis: Townley Laboratories
1750 West Front Street
Plainfield, NJ 07063

b. QA/QC procedures utilized for sample collection: Collected with a stainless spatula. The spatula was cleaned with water and rinsed with acetone between samples

c. QA/QC procedures utilized for sample analysis: Townley Labs followed standard methods for the analysis of waste samples.

d. Rationale for location, frequency and number of samples: Six samples exceeds the post-remedial sampling frequency of one sample per 900 square feet of contaminated area as specified in N.J.A.C. 7: 26E-6.4.3

e Detailed description of methodology for all samples:

I. Sampling containers and equipment - type, closure, cleanings: Samples were placed in laboratory cleaned glass jars with screw caps

II. Use of QA blanks and replicates: None

III. Ground water monitoring well permit number, design and installation technique: Not Applicable

IV. Chain of custody procedures: See attached chain of custody document

f. Description of analytical methodology by parameter and rationale for selection of parameter and methodology: The six samples were analyzed for moisture content and total lead on a dry weight basis for each sample.

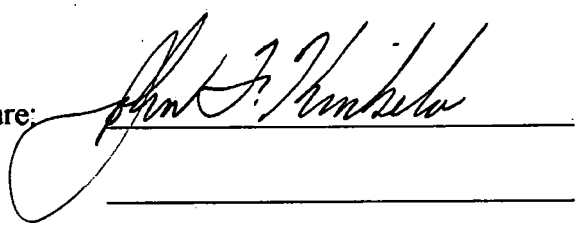
g. List of parameter concentrations for each hazardous substance analyzed for: See attached Table I . All but one sample, Sample F (716 milligrams per kilogram), were below the proposed residential cleanup standard of 400 milligrams per kilogram. the average total lead concentration on a wet basis for all sampless was 201 milligrams per killogram which is well below the proposed residential cleanup standard

22. Any supplementing information: TCLP analysis of gravel wastes

23. Certification of financial responsibility for major facilities: Not Applicable

CERTIFICATION

"I certify under penalty of law that the information provided in this document is true, accurate and complete. I am aware that there are significant civil and criminal penalties, including fines or imprisonment or both, for submitting false, inaccurate or incomplete information."

Signature: 

Submitted by: Certified Mail, Return Receipt Requested.

Table 1
Concentration of Lead in Soil
After Removal of Spilled Material
Lenox, Incorporated
Pomona, New Jersey

Sample ID	Lead (mg/Kg dry)	Moisture (%)	Lead (mg/Kg wet)
Sample A	248	17.0	206
Sample B	188	11.2	167
Sample C	<58	13.8	<5
Sample D	30	10.8	27
Sample E	102	14.8	87
Sample F	810	10.6	716

Samples were analyzed by Townley Labs, N.J.

96-20725-30

TOWNLEY LABORATORIES

1750 W. Front Street, Plainfield, NJ 07063 (908) 757-1137

CHAIN OF CUSTODY

CO. NAME: Lenox China

PROJECT:

SAMPLER (PRINT & SIGN): Jim Ennis

W/O

TESTS: TTo / Lead

W M Q S A

LABORATORY ANALYSIS

DATE	TIME	C	G	LOCATION	# BTLS	REMARKS
12/7/96	3:30			A		96-20725
"	↓			B		96-20726
"				C		96-20727
"				D		96-20728
"				E		96-20729
"				F		96-20730

PRESERVATION CHECK ON RECEIPT:

PRINT & SIGN

RELINQUISHED BY	DATE	TIME	RECEIVED BY	RELINQUISHED BY	DATE	TIME	RECEIVED BY
Jim Ennis	12/8/96	1:05					
RELINQUISHED BY	DATE	TIME	RECEIVED BY	RELINQUISHED BY	DATE	TIME	RECEIVED BY

FIELD ANALYSIS

SAMPLER (PRINT & SIGN):

ANALYST (PRINT & SIGN):

TESTS: PH (su) / TEMP. (F°) / CL RES (mg/l) / FR CL (mg/l) / T CL (mg/l) / BR (mg/l) / COND (umhos) / WEATHER

DATE	TIME	C	G	LOCATION	RESULTS

N

75

76

2-3" DIA. O/H INFLUENT PIPES INSIDE 10" DIA. PIPE

SURGE TANK

POLE #5

ABANDONED AND EXCAVATED POLISHING LAGOON

70

69

68

SUPERVISORS OFFICE BLDG. (SILL ELEV. 66.37')

POLE #3

AREA OF SPILL

F

E

D

C

B

A

TOTAL AREA OF SPILL= 4310.2 S.F.

(A) INDICATES SOIL SAMPLING LOCATION(S) (A THRU F)

FILTER BUILDING (FIN FLR. EL. 68.04')

FIN. ELEV. 67.32

20'-0" DIA. CLARIFIER

POLE #4

CONC. APRON

WATER TANK

PLANT

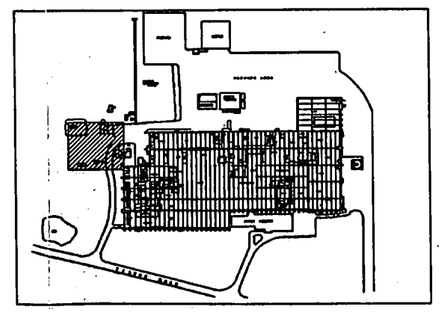
66

68

67

66

65



VICINITY PLAN

NEW JERSEY SPILL REPORT
CASE NO. 96-12-6-1501-58

SCALE: 1"=30'-0"

Callahan

LENOX

December 19, 1996

CERTIFIED MAIL - RETURN RECEIPT REQUESTED # P 543413114

Mr. Andrew Park
United States Environmental Protection Agency
Air and Waste Management Division
Hazardous Waste Facilities Branch
Region II
26 Federal Plaza
New York, New York 10278

Re: HSWA Permit #NJD002325074

Memorandum of Agreement - Lenox China
Tilton Road, Galloway Township, Atlantic County
Block 453, Lot 1
Case #: 95-6-29-0905-37

Dear Mr. Park,

This letter is to inform you that Lenox China has made a verbal spill report to the New Jersey hotline on December 6, 1996. Mr. Faranca, New Jersey Department of Environmental Protection, was also notified and has been assigned as the case manager. A written spill report will be filed on or before January 5, 1997 . You will be copied. The spilled solid material which contained lead was immediately removed. Postremoval sampling of the soil indicates that the New Jersey proposed cleanup standards have been achieved.

Should you have any questions concerning the above, please do not hesitate to contact me at (609) 484-9798.

Sincerely,

John F. Kinkela
Director of Environmental Engineering

JFK/jfk

cc: M. Chinn
L. Fantin

Frank Faranca
New Jersey Department of Environmental Protection
Division of Responsible Party Site Remediation
Bureau of Federal Case Management
401 East State Street CN 028
Trenton, New Jersey 08625-0028

United States Environmental Protection Agency
Office of Policy and Management
Permits Administration Branch
Region II
26 Federal Plaza
New York, New York 10278

Regional Administrator ✓
United States Environmental Protection Agency
Region II
26 Federal Plaza
New York, New York 10278

LENOX

December 19, 1996

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Air and Waste Management Division
Hazardous Waste Facilities Branch
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26 Federal Plaza
New York, New York 10278

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26 Federal Plaza
New York, New York 10278

Regional Administrator
United States Environmental Protection Agency
Region II
26 Federal Plaza
New York, New York 10278

F-1F

1/9

ROUTING AND TRANSMITTAL SLIP

TO: (Name, office symbol, room number, building, Agency/Post)	Initials	Date
1. Kathleen Callahan, Director, DEPP		
2. Kevin Bricke, Deputy Director, DEPP		
3. Georglos Pavlou, Deputy Director, DEPP		
4. William Baker, Air Senior Policy Advisor		
5. Andrew Bellina, RCRA Senior Policy Advisor		
6. Paul Molinari, Water Senior Policy Advisor		
7. Walter Andrews, Chief, Water Programs Branch		

	Action		File		Note and Return
	Approval		For Clearance		Per Conversation
	As Requested		For Correction		Prepare Reply
	Circulate		For Your Information		See Me
	Comment		Investigate		Signature
	Coordinate		Justify		

REMARKS

8. Raymond Basso, Chief, RCRA Programs Branch
9. Ronald Borsellino, Chief, Air Programs Branch
10. Mario Delvicario, Chief, Place-Based Protection Branch
11. Paul Giardina, Chief, Radiation and Indoor Air Branch
12. Robert Hargrove, Chief, Strategic Planning & Multi-Media Programs Branch
13. Edith Hernandez, Administrative Assistant
14. Dore Laposta, Chief, NYC Watershed Team
15. Stanley Siegel, Chief, Permits Integration Team
16. Mark Tedesco, Chief, LIS Office
17. Christine Yost, Tribal Programs Coordinator

DUE:_____

DO NOT use this form as a RECORD of approvals, concurrences, disposals, clearances, and similar actions

FROM: (Name, org. symbol, Agency/Post)	Room No. Bldg. 25TH FL. E51
DIVISION OF ENVIRONMENTAL PLANNING AND PROTECTION	Phone No. 7-3725